

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND

U.S. BANKRUPTCY COURT
DISTRICT OF MARYLAND
BALTIMORE

2018 JAN 11 PM 2:08

FILED

IN RE:)
)
MISCELLANEOUS PROCEEDING)
TO SUBSTITUTE COUNSEL)

MISCELLANEOUS PROCEEDING TO WITHDRAW/SUBSTITUTE COUNSEL

COMES NOW, BP Fisher Law Group, LLP. and hereby move the Court to remove Krysta Kerr (Federal Bar No. 17621) and substitute Michael Kuhn (Federal Bar No. 03533) in open bankruptcy cases (See Exhibit A) before the Court and submit this Motion to Withdraw/Substitute Counsel and respectfully represent as follows:

1. Krysta Kerr is no longer employed by BP Fisher Law Group, LLP. However, an attorney-client relationship continues to exist between BP Fisher Law Group, LLP and the creditors of record in various open and pending bankruptcy matters.
2. To prevent an interruption in representation and a reduction in the services provided to the client, undersigned counsel requests that Krysta Kerr be removed as counsel of record in all matters on the attached list.
3. Michael Kuhn, Federal Bar No: 03533 will continue in place and stead of Krysta Kerr as counsel of record in all matters identified in the attachment.

WHEREFORE, BP Fisher Law Group, LLP prays that his Court enter an Order removing Krysta Kerr and submitting Michael Kuhn as counsel of record in the attached list of cases and grant such other and further relief as may be just and necessary.

Respectfully submitted,

Dated: January 8, 2018

/s/ Michael Kuhn
Michael Kuhn, Bar # 03533
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